

JOHN C. DORCUS, et al * IN THE
COMPLAINANTS * CIRCUIT COURT
VS. * FOR
FORD GOELLER and NINA GOELLER * FREDERICK COUNTY, MARYLAND
RESPONDENTS * NO. 25,171 EQUITY

* * * * *
MOTION FOR ORDER COMPELLING DISCOVERY
OR IMPOSING SANCTIONS

Your Complainants, by their attorney, F. Theodore Elliot, do hereby move before an order compelling the Respondents, Ford Goeller and Nina Goeller, to answer interrogatories, alleging:

1. Written interrogatories were filed in the above captioned case on the 15th day of February, 1978, requiring your Respondents to answer within a period of thirty (30) days thereafter.

2. To date, Respondents have failed to answer, although reasonable notice of said failure, and of the Complainants' intention to move for an Order Compelling Discovery, was given to Respondents by letter dated the 13th day of September, 1978, a copy of which is attached hereto and hereby made a part of this Motion.

WHEREFORE, your Complainants pray that this Honorable Court Order the Respondents to answer the interrogatories aforesaid; Order that the matters alleged by the Complainants in their Bill of Complaint be taken to be established for the purposes of the action; Order that the Respondents not be allowed to oppose the matters and facts alleged in the Bill of Complaint and not be allowed to support the matters and facts alleged in their answer; or render a Decree Pro Confesso against the Respondents, granting the relief prayed by the Complainants in their Bill of Complaint.